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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

ALLEN M. MILLER,

Plaintiff,

v.

C.H. ROBINSON WORLDWIDE, INC.,  
RONEL R. SINGH, RHEAS TRANS, INC.,  
And KUWAR SINGH dba RT SERVICE,

Defendants.

Case No.: 3:17-cv-00408-MMD-WCG

**DECLARATION OF RENA M.  
LEIZERMAN, ESQ. IN SUPPORT OF  
PLAINTIFF'S RESPONSE TO C.H.  
ROBINSON WORLDWIDE, INC.'S  
MOTION FOR SUMMARY JUDGMENT**

I, RENA LEIZERMAN, ESQ., being duly sworn under penalty of perjury, state:

1. I am over the age of 18 and make the statements in this Declaration based on my personal knowledge.
2. I am an attorney of record representing Plaintiff Allen M. Miller in this matter.
3. I have attached **EXHIBITS A-T** in support of Plaintiff Allen Miller's Response to C.H. Robinson Worldwide, Inc. (CHR)'s Motion for Summary Judgment (ECF No. 124):

- 1 A. **Exhibit A** is a true and correct copy of excerpts from Bruce Johnsons' Rule 30(b)(6)  
2 deposition in *Gilley v. CHR*, No. 1:18-CV-00536 (S.D. W. Va. Feb. 12, 2020) and this  
3 matter.
- 4 B. **Exhibit B** is a true and correct copy of CHR's response to Interrogatory No. 4.
- 5 C. **Exhibit C** is a true and correct copy of excerpts from Rheas Trans's registration  
6 application, deposition exhibit 2.
- 7 D. **Exhibit D** is a true and correct copy of Dr. Thomas Corsi's affidavit, reports,  
8 credentials, and case list.
- 9 E. **Exhibit E** is a true and correct copy of excerpts from Ronel Singh's Chapter 7 petition.
- 10 F. **Exhibit F** is a true and correct copy of excerpts from RT Service's registration  
11 application, deposition exhibit 3.
- 12 G. **Exhibit G** is a true and correct copy of excerpts from Ronel Singh's deposition.
- 13 H. **Exhibit H** is a true and correct copy of the Contract Addendum and Load Confirmation  
14 produced at Bates stamp ROBINSON 0056-0059.
- 15 I. **Exhibit I** is a true and correct copy of RT Service's Carrier Sign-Up produced at Bates  
16 stamp ROBINSON 0110.
- 17 J. **Exhibit J** is a true and correct of screenshots from CHR's database. (**UNDER SEAL**<sup>1</sup>)
- 18 K. **Exhibit K** is a true and correct copy of CHR and RT Service's master broker-carrier  
19 contract produced at Bates stamp ROBINSON 0112-0122.
- 20 L. **Exhibit L** is a true and correct copy of Steven Belyus's affidavit, report, credentials,  
21 and case list.
- 22 M. **Exhibit M** is a true and correct copy of Noble West Insurance Agency's marketing  
23 worksheet, deposition exhibit 707, produced by Noble West pursuant to subpoena.
- 24 N. **Exhibit N** is a true and correct copy of excerpts from Nevada Highway Patrol's MIRT  
25 Report produced at Bates stamp Miller 0008561 and 0008581.
- 26 O. **Exhibit O** is a true and correct copy of CHR and Costco Wholesale's contract produced  
27 at Bates stamp ROBINSON 0176-0181.

28 <sup>1</sup> Contemporaneous with this filing, Plaintiff will file a motion for leave to file Exhibit J under seal.

1 P. **Exhibit P** is a true and correct copy of excerpts from Sergeant Benjamin Jenkins's  
2 deposition.

3 Q. **Exhibit Q** is a true and correct copy of excerpts from Steven Belyus's deposition.

4 R. **Exhibit R** is a true and correct copy of excerpts from Lane VanIngen's deposition.

5 S. **Exhibit S** is a true and correct copy of the Release and Covenant Not to Execute with  
6 the Settling Defendants.

7 T. **Exhibit T** is a true and correct copy of excerpts from the *Volkova v. CHR* hearing  
8 transcript.

9 Dated: July 29, 2021

10 /s/ Rena Mara Leizerman  
11 Rena M. Leizerman, Esq.  
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**CERTIFICATE OF SERVICE**

Under FRCP 5(b), I certify that on July 29, 2021, I directed the electronic filing of the foregoing with the Clerk of the Court with the electronic filing system which served the following individuals electronically:

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/s/ Rena Mara Leizerman  
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